

RYAN J. WORKS, ESQ. (NSBN 9224)  
AMANDA M. PERACH (NSBN 12399)  
McDONALD CARANO WILSON LLP  
2300 West Sahara Avenue, Suite 1200  
Las Vegas, Nevada 89102  
Telephone: 702.873.4100  
rworks@mcdonaldcarano.com  
aperach@mcdonaldcarano.com

*Attorneys for Nationwide Title Clearing, Inc.*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

SALMA AGHA-KHAN, MD., an individual,

Plaintiff,

vs.

WELLS FARGO BANK, NA, A US BANK;  
WELLS FARGO FINANCIAL NATIONAL  
BANK, A National Banking Association; WELLS  
FARGO HOME MORTGAGE, a Wells Fargo  
Bank, NA subsidiary; MORTGAGE  
ELECTRONIC REGISTRATION SYSTEMS,  
INC., a Delaware agency/corporation, form  
unknown; MERSCORP HOLDINGS INC,  
holding/parent company of MERS INC.; TBI  
MORTGAGE COMPANY, a mortgage company;  
GMAC MORTGAGE, LLC FKA GMAC  
MORTGAGE CORPORATION, a financial  
lending business; OCWEN FINANCIAL  
CORPORATION, a financial concern, form  
unknown; MARIN CONVEYANCING CORP  
AKA MARIN CONVEYANCING  
CORPORATION, a lending corporation form  
unknown; EXECUTIVE TRUSTEE SERVICES,  
LLC, a defunct Delaware company form unknown;  
FIRST AMERICAN TITEL COMPANY, a title  
agency form unknown; FIRST AMERICAN TITLE  
INSURANCE COMPANY, a title Insurance  
company form unknown; ROUTH CRABTREE  
OLSEN PS, a law firm in California; EDWARD T.  
WEBER, an individual and attorney at Routh  
Crabree Olsen PS; BRETT P. RYAN, an individual  
and attorney at Routh Crabree Olsen PS;  
JOHNATHAN J. DAMEN, an individual and  
attorney at Routh Crabree Olsen PS; JEFF ROMIG  
AKA JEFFREY L. ROMIG, an individual;  
PATRICIA J. KRAUSE, an individual;  
GREENPOINT MORTGAGE FUNDING, INC., a  
mortgage company form unknown;  
SERVICELINK AKA SERVICELINK, LLC a

Case No.: 2:16-cv-02928-APG-PAL

**NATIONWIDE TITLE CLEARING  
INC.'S EX PARTE MOTION TO  
EXTEND DEADLINE TO ANSWER  
OR OTHERWISE RESPOND TO  
COMPLAINT (FIRST REQUEST)**

business organization form unknown; LSI TITLE AGENCY INC, a title agency form unknown; CHICAGO TITLE COMPANY, a title company form unknown; FIDELITY NATIONAL DEFAULT SOLUTIONS INC, a company form unknown; NATIONWIDE TITLE CLEARING, a title company form unknown; AMANDA ROSE JONES, an individual and Assistant Secretary for MERS Inc; KRISTOPHER JAMES SANDBERG, a Wells Fargo employee; AND DOES 1 THROUGH 1000 INCLUSIVE,

Defendants.

Pursuant to Local Rule IA 6-1, the Defendant, Nationwide Title Clearing, Inc. (“NTC”) respectfully requests that the Court extend the time for it to answer the Complaint (ECF No. 1) for the reasons set forth below. This Motion is based upon the papers on file, the arguments below and the Declaration of Amanda M. Perach, Esq. (the “Perach Decl.”). This is the first request for an extension of the deadline to answer or otherwise respond to the Complaint.

1. On January 3, 2017, general counsel for NTC received the Complaint in Palm Harbor, Florida. Perach Decl. at ¶ 4.

2. The Complaint is seventy-five pages long, excluding exhibits, and includes 27 listed defendants. (ECF No. 1)

3. Upon receiving the Complaint, general counsel endeavored to review the Complaint and following that review, NTC attempted to locate local Nevada counsel to represent it in this litigation. Perach Decl. at ¶ 5.

4. NTC eventually requested that McDonald Carano Wilson, LLP serve as its litigation counsel in this action; however due to the substantial amount of parties involved the conflicts review took several days to complete and, therefore, the engagement could not be finalized until January 13, 2017. Perach Decl. at ¶ 6.

5. Thereafter, on the morning of January 20, 2017, after reviewing the lengthy Complaint, NTC’s litigation counsel attempted to contact the Plaintiff, Salma Agha Khan, by telephone to request an extension to answer or otherwise respond to the Complaint. Perach Decl. at ¶ 7. To date, no response has been received. *Id.*

//

1 For these reasons, NTC respectfully requests that the Court set the time for NTC to  
2 answer or otherwise respond to the Complaint for February 7, 2017, which is 14 days from the  
3 current deadline to respond.

4 DATED this 23rd day of January, 2017.

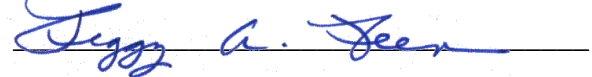
5 McDONALD CARANO WILSON LLP

6 By: /s/ Amanda M. Perach

7 RYAN J. WORKS, ESQ. (NSBN 9224)  
8 AMANDA M. PERACH (NSBN 12399)  
9 McDONALD CARANO WILSON LLP  
2300 West Sahara Avenue, Suite 1200  
Las Vegas, Nevada 89102  
Telephone: 702.873.4100  
rworks@mcdonaldcarano.com  
aperach@mcdonaldcarano.com

11 *Attorneys for Defendant*  
12 *Nationwide Title Clearing, Inc.*

14 IT IS SO ORDERED:

15 

16 UNITED STATES MAGISTRATE JUDGE

17 DATED: \_ January 24, 2017

McDONALD • CARANO • WILSON LLP  
2300 WEST SAHARA AVENUE, SUITE 1200 • LAS VEGAS, NEVADA  
PHONE (702) 873-4100 • FAX (702) 873-9966

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of McDonald Carano Wilson LLP, and that on the 23rd day of January, 2017, I served a true and correct copy of the foregoing **NATIONWIDE TITLE CLEARING INC.'S *EX PARTE* MOTION TO EXTEND DEADLINE TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT (FIRST REQUEST)** via the Court's electronic filing system and U.S. Mail, as follows:

Salma Agha-Khan, M.D.  
3751 Motor Ave, #34272  
Los Angeles, CA 90034  
Telephone: (949)332-0330  
Email: salmahagha@aol.com

*Pro Se Plaintiff*

/s/ Marianne Carter  
An employee of McDonald Carano Wilson LLP

377932

RYAN J. WORKS, ESQ. (NSBN 9224)  
AMANDA M. PERACH (NSBN 12399)  
McDONALD CARANO WILSON LLP  
2300 West Sahara Avenue, Suite 1200  
Las Vegas, Nevada 89102  
Telephone: 702.873.4100  
rworks@mcdonaldcarano.com  
aperach@mcdonaldcarano.com

*Attorneys for Nationwide Title Clearing, Inc.*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

SALMA AGHA-KHAN, MD., an individual,

Plaintiff,

vs.

WELLS FARGO BANK, NA, A US BANK;  
WELLS FARGO FINANCIAL NATIONAL  
BANK, A National Banking Association; WELLS  
FARGO HOME MORTGAGE, a Wells Fargo  
Bank, NA subsidiary; MORTGAGE  
ELECTRONIC REGISTRATION SYSTEMS,  
INC., a Delaware agency/corporation, form  
unknown; MERSCORP HOLDINGS INC,  
holding/parent company of MERS INC.; TBI  
MORTGAGE COMPANY, a mortgage company;  
GMAC MORTGAGE, LLC FKA GMAC  
MORTGAGE CORPORATION, a financial  
lending business; OCWEN FINANCIAL  
CORPORATION, a financial concern, form  
unknown; MARIN CONVEYANCING CORP  
AKA MARIN CONVEYANCING  
CORPORATION, a lending corporation form  
unknown; EXECUTIVE TRUSTEE SERVICES,  
LLC, a defunct Delaware company form unknown;  
FIRST AMERICAN TITEL COMPANY, a title  
agency form unknown; FIRST AMERICAN TITLE  
INSURANCE COMPANY, a title Insurance  
company form unknown; ROUTH CRABTREE  
OLSEN PS, a law firm in California; EDWARD T.  
WEBER, an individual and attorney at Routh  
Crabree Olsen PS; BRETT P. RYAN, an individual  
and attorney at Routh Crabree Olsen PS;  
JOHNATHAN J. DAMEN, an individual and  
attorney at Routh Crabree Olsen PS; JEFF ROMIG  
AKA JEFFREY L. ROMIG, an individual;  
PATRICIA J. KRAUSE, an individual;  
GREENPOINT MORTGAGE FUNDING, INC., a  
mortgage company form unknown;  
SERVICELINK AKA SERVICELINK, LLC a

Case No.: 2:16-cv-02928-APG-PAL

**DECLARATION OF AMANDA M.  
PERACH, ESQ. IN SUPPORT OF  
NATIONWIDE TITLE CLEARING  
INC.'S EX PARTE MOTION TO  
EXTEND DEADLINE TO ANSWER  
OR OTHERWISE RESPOND TO  
COMPLAINT (FIRST REQUEST)**

business organization form unknown; LSI TITLE AGENCY INC, a title agency form unknown; CHICAGO TITLE COMPANY, a title company form unknown; FIDELITY NATIONAL DEFAULT SOLUTIONS INC, a company form unknown; NATIONWIDE TITLE CLEARING, a title company form unknown; AMANDA ROSE JONES, an individual and Assistant Secretary for MERS Inc; KRISTOPHER JAMES SANDBERG, a Wells Fargo employee; AND DOES 1 THROUGH 1000 INCLUSIVE,

Defendants.

I, Amanda M. Perach, declare as follows:

1. I am over the age of eighteen (18) years. I have personal knowledge of the facts stated within this Declaration. If called as a witness, I would be competent to testify to these facts.

2. I am an attorney licensed to practice law in the State of Nevada, an associate with the law firm of McDonald Carano Wilson LLP ("McDonald Carano"), and attorney of record for defendant Nationwide Title Clearing, Inc. ("NTC") in the action entitled Salma Agha-Khan, MD. v. Wells Fargo Bank, NA, et al., Case No. 2:16-cv-02928-APG-PAL, pending in the United States District Court, District of Nevada (the "Action").

3. This Declaration is submitted in support of NTC's Motion to Extend Deadline to Answer or Otherwise Respond to Complaint (First Request) ("Motion") and is made of my own personal knowledge except where stated on information and belief, and as to those matters, I believe them to be true, and I am competent to testify thereto if called upon to do so.

4. Upon information and belief, on January 3, 2017, general counsel for NTC received the Complaint in Palm Harbor, Florida.

5. Upon further information and belief, upon receiving the Complaint, general counsel endeavored to review the Complaint and following that review, NTC attempted to locate local Nevada counsel to represent it in this litigation.

6. NTC eventually requested that McDonald Carano Wilson, LLP serve as its litigation counsel in this action; however due to the substantial amount of parties involved the

1 conflicts review took several days to complete and, therefore, the engagement could not be  
2 finalized until January 13, 2017.

3 7. Thereafter, on the morning of January 20, 2017, after reviewing the lengthy  
4 Complaint, I attempted to contact the Plaintiff, Salma Agha Khan, by telephone to request an  
5 extension to answer or otherwise respond to the Complaint. To date, no response has been  
6 received.

7 I, Amanda M. Perach, do hereby declare under penalty of perjury that that the foregoing  
8 is true and correct.

9 Executed on: January 23, 2017

/s/ Amanda M. Perach

Amanda M. Perach, Esq.